

# Exhibit H

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
-against- ) 20-cv-7311(LAK)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*

VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

1

2

3

4

5

6

7

8

October 14, 2022

9

10:15 a.m.

10

11

Confidential videotaped

12

deposition of E. JEAN CARROLL, before

13

Cathi Irish, a Registered Professional

14

Reporter, Certified Realtime Reporter,

15

and Notary Public of the State of

16

New York.

17

18

19

20

21

22

23

24

25

1

2 A P P E A R A N C E S:

3

4 KAPLAN HECKER & FINK LLP

5 Attorneys for Plaintiff

6 350 Fifth Avenue

7 63rd Floor

8 New York, New York 10018

9 BY: ROBERTA A. KAPLAN, ESQ.

10 SHAWN CROWLEY, ESQ.

11 MATTHEW CRAIG, ESQ.

12 RACHEL TUCHMAN, ESQ.

13

14 HABBA MADAIO & ASSOCIATES LLP

15 Attorneys for Defendant

16 1430 US Highway 206

17 Suite 240

18 Bedminster, New Jersey 07921

19 BY: ALINA HABBA, ESQ.

20 MICHAEL MADAIO, ESQ.

21

22 ALSO PRESENT:

23 JON DIFILIPPO, videographer

24 PETER GABRA

25

1 CARROLL - CONFIDENTIAL

2 more pounds. And that was one of the  
3 things that went through my mind was how  
4 big and heavy he was because his whole  
5 weight came, his shoulder came into me and  
6 so at this point I realized it was  
7 serious. I was shocked before because he  
8 put me against the wall but now I  
9 understood that this is -- this is a  
10 battle, and he pulled down my tights.

11 Q. Did you feel like he was trying  
12 to hurt your head when he --

13 A. No, no. No. He was not trying  
14 to hurt me. He was trying to rape me and  
15 it was -- it was a situation which I never  
16 would have -- when it went from good humor  
17 joshing into being up against the wall and  
18 then having that heavy weight against me.

19 Q. What did he do after that?

20 A. He pulled down my tights.

21 Q. Had you said anything at this  
22 point?

23 A. I cannot believe that I didn't  
24 say anything but I don't remember that I  
25 said anything. That doesn't mean I didn't

1 CARROLL - CONFIDENTIAL

2 say anything but I -- I can't imagine  
3 being quiet. I can't imagine not saying  
4 anything but I can't remember saying  
5 anything.

6 Q. Did you scream?

7 A. No.

8 Q. Did you push him?

9 A. Yes.

10 Q. Where?

11 A. I had my purse in this hand.

12 Q. In your right hand?

13 A. Right hand. And I tried to get  
14 my arms up to push him back, to push him  
15 back. The problem was I couldn't get my  
16 knee up because the pantyhose had been  
17 taken down.

18 Q. So he had hit your head twice  
19 prior to taking your pantyhose off  
20 according to you; right?

21 A. He didn't take the pantyhose off.

22 Q. He did not?

23 MS. KAPLAN: Again --

24 THE WITNESS: No, he did not take  
25 the pantyhose off.

1 CARROLL - CONFIDENTIAL

2 BY MS. HABBA:

3 Q. Okay. So what happened?

4 A. Pulled them down.

5 Q. And then what happened?

6 A. And then I felt his fingers  
7 rummaging around my vagina and this huge  
8 weight against me. My head hurt, this  
9 huge weight, I'm in a situation where I  
10 can't -- I can't -- at one point I  
11 remember saying this is Donald Trump, what  
12 the heck is going on? And then I felt his  
13 penis inside of me.

14 Q. So sorry to get into details  
15 but --

16 A. No, I understand.

17 Q. If you're against the wall, it  
18 was his right shoulder that you are  
19 describing was pushing into you?

20 A. Left, I think.

21 Q. His left shoulder, sorry, because  
22 you did touch your left side so I assumed  
23 it was the right. So it was his left  
24 shoulder and he used his right hand?

25 A. I don't know. I couldn't see his

1 CARROLL - CONFIDENTIAL

2 Q. Have you ever questioned if what  
3 happened in that dressing room was rape?

4 MS. KAPLAN: Objection to form.  
5 You can answer.

6 THE WITNESS: I question whether  
7 he thought it was rape. I never  
8 questioned what I thought.

9 BY MS. HABBA:

10 Q. During the two decades that  
11 followed, how would you say the alleged  
12 attack impacted your life?

13 A. Well, four or five years ago I  
14 would have told you it had no effect. I'm  
15 as good as new. This is great. I'm fine.  
16 I rarely think of it but I've come to  
17 understand that that rape changed my life  
18 which is shocking for me to now  
19 understand.

20 Q. When you say four or five years  
21 ago, do you mean when you started this  
22 lawsuit?

23 A. No, before that, before that.  
24 I'm talking about the time before this.

25 Q. Before the lawsuit.